



**Update on Activities at OU1, Former Export Plant
Libby Asbestos Site, Libby, MT
Update: June 22, 2006**

On May 31st, 2006, the City of Libby began digging a 900 ft trench at the site in preparation for installation of a waterline. A detailed description of those activities and the events that followed is also included with this update. EPA issued a desk statement on the activities (included in this update) and drafted discussion points. The discussion points are as follows:

- The City of Libby conscientiously informed EPA of their intention to dig this trench at the old Export Plant Site.
- EPA informed the City that it was likely they might run into contaminated soil at depth and to contact us if/when vermiculite was encountered.
- As predicted, vermiculite was indeed encountered, the City contacted EPA, and EPA arrived at the site to monitor the situation.
- Specific care was taken to control and contain contaminated soil as it was removed.
- The contaminated soil was disposed of properly.
- At this time the exposed trench indicates that W.R. Grace met the performance standards for the cleanup but this will not be the final conclusion until additional field work is completed.
- Since the contamination in the excavation appeared widespread beneath the cap, EPA and its contractors took over for the City and closed the project.

On Tuesday June 13th, the EPA team met with Libby Mayor, Tony Berget, City Council Member, Stu Christmore, several City employees who were working on the Site, and Dan Thede, Libby City Superintendent at the City Hall. The current activities at the site were discussed and a plan for completing the work was made.

The immediate next steps (to be carried out by 6/16/06):

- Lining the contaminated walls of the trench with plastic (EPA)
 - This was completed 6/13/06 with instructions on safe working practices.
- Lining the trench bottom with clean sand (City)
 - The city workers performed this activity prior to finishing waterline installation.
- Performing a respirator fit for City employees who will be working in the trench (connecting the waterline and pressure testing the waterline) (EPA/City)
 - This was completed for city workers who would be performing the work in the “plastic lined trench zone”. The workers that were fitted are under a respirator monitoring program as part of the local Fire Department.
- Finishing the work on the waterline by connecting it to the fire hydrant (City)

- The on-site RPM and EPA contractor's SSHO provided safe working practice training for City workers and the City Supervisor on 6/16/06. In addition, EPA and the contractor provided oversight during the continued installation of the waterline.
- Backfilling the trench with excavated material and 18 inches of clean fill (City)
 - Contaminated soils were hauled off site to the former mine. The soils that were left behind were sampled and the results were less than 1% asbestos. These soils will be used as backfill up to the 18" mark and clean backfill will be utilized for the final 18".
 - The City has since super chlorinated the lines and performed pressure tests. The pressure tests failed and they are currently working on this.

The long-term steps (to be carried out by 7/17/06):

EPA will work with the City of Libby to plan for completion of 730 feet of trench digging. This work will be done in order to connect the waterline to the Search and Rescue building. EPA is currently working with its contractors to finalize a design to perform the excavation of the needed trench. The trenching activities will include: following OSHA trenching excavation criteria which will include sloping trench walls. This method and over-excavating the slopes by one foot on each side should eliminate the need to chase the material and leave the trench better suited for backfill and any repair work that may show up in the future to accommodate an acceptably safe work zone. We will also support the city with marking as-builts with any areas of possible concern in the future. The City will be responsible for waterline installation, treatment, tests and backfill of the new waterline.

EPA and the City of Libby will continue working together to establish a protocol and procedure for conducting work at the Export Plant property and at other locations in Libby where contamination may be encountered.

Long-term Operations and Maintenance activities were discussed and everyone was in general agreement that EPA and local entities should work closely together in order to adopt policies and procedures that will protect both human health and any remedy that may be in place at Libby residences or cleanup sites. The idea that contamination is left at depth (standard EPA practice) and that contamination may be found during normal excavation work was discussed. EPA is committed to working with the City on redevelopment at the Export Plant and will provide technical assistance on how to facilitate the redevelopment.